

MICHAEL MCCARTHY, et al.,)	CIVIL ACTION NO.
)	1:20-cv-10701-DPW
Plaintiffs,)	
)	
-against-)	
)	
CHARLES D. BAKER, et al.,)	
)	
Defendants.)	
)	
)	
CEDRONE, LLC, et al.,)	CIVIL ACTION NO.
)	1:20-cv-40041-DPW
Plaintiffs,)	
)	
-against-)	
)	
CHARLES D. BAKER, et al.,)	
)	
Defendants.)	
)	

The Plaintiffs and Defendants in the above-captioned actions respectfully submit this proposed pretrial schedule pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(d), as modified by the Court's order of May 7, 2020.

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by June 12, 2020.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after June 19, 2020.
3. **Discovery -Interim Deadlines.**

- a. The parties will serve written discovery requests (*i.e.* requests for production, interrogatories and requests for admission) by June 19, 2020.¹
 - b. All depositions must be completed by August 14, 2020.
4. **Discovery -Final Deadline.** All discovery must be completed by August 14, 2020.²
5. **Status Conference.** A status conference will be held on {tbd}.
6. **Dispositive Motions.**
 - a. Plaintiffs will move for summary judgment by August 28, 2020.
 - b. Defendants will cross-move for summary judgment and/or otherwise to dismiss, and will respond to Plaintiffs' motion, by September 18, 2020.
 - c. Plaintiffs may file a response and reply brief by October 2, 2020.
 - d. Defendants may file a reply brief to Plaintiffs' reply, if any, by October 9, 2020.

Dated: May 28, 2020

Respectfully submitted,

THE *McCarthy* PLAINTIFFS,
By their attorneys,

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¹ The Plaintiffs intend to rely on the testimony of Massad Ayoob as an expert witness, whose declaration was previously provided to the Court, and will include the details required by FRCP 26(a)(2) with their FRCP 26(a)(1) disclosure. If Defendants anticipate use of expert testimony, they will provide their FRCP 26(a)(2) disclosure by July 3, 2020.

² Agreement to these deadlines is without prejudice to Defendants' right to seek a stay of any discovery on issues that would be resolved by their motion to dismiss.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 28, 2020.

/s/ David D. Jensen
David D. Jensen, Esq.